

## Nickel, Brian

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**From:** Washington, Diana (ECY) [DWAS461@ECY.WA.GOV]  
**Sent:** Thursday, October 03, 2013 4:11 PM  
**To:** Nickel, Brian  
**Cc:** Key, Ellie (ECY); jbel461@ecy.wa.gov; Hallinan, Patrick J. (ECY); Knight, David T. (ECY)  
**Subject:** FW: Signed letter attached  
**Attachments:** EPA Idaho Dischargers formal comments signed.pdf

Hi Brian,

Please find attached an electronic copy of our comments on the Draft Idaho Discharge Permit. We have a hard copy in the mail to you. If you have any question, please let me know. Thank you, Diana

Diana Washington, P.E.  
Eastern Regional Office  
Water Quality Program  
Phone: 509-329-3504  
[dwas461@ecy.wa.gov](mailto:dwas461@ecy.wa.gov)

Typical Work Hours: M, W, Th 8-5:30PM; Tu 8-3:30PM; and F 8-2:30PM  
I am typically unavailable from 12-12:30 pm for lunch.

Your present circumstances don't determine where you can go; they merely determine where you start.  
**Nido Qubein**

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**From:** Dunlap, Robyn (ECY)  
**Sent:** Thursday, October 03, 2013 3:56 PM  
**To:** Washington, Diana (ECY)  
**Subject:** Signed letter attached

Robyn E. Dunlap  
Secretary Lead  
Washington Dept. of Ecology  
Water Quality, Eastern Regional Office  
4601 N. Monroe Street  
Spokane, Washington 99205-1295  
(509) 329-3557

## Nickel, Brian

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**From:** Susan Barragan [barragan@tmw-law.com]  
**Sent:** Thursday, October 03, 2013 1:52 PM  
**To:** Nickel, Brian  
**Subject:** Comments on City of Coeur d'Alene WWTP Draft NPDES Permit Number ID-002285-3  
**Attachments:** 2013-10-03 NPDES Comment.pdf; Attachment A - CDA 401 Comment Ltr.pdf; Attachment B - CDA Facility Plan Update.pdf; Attachment C - Plant History.pdf

Please see the attached comment letter with attachments regarding the above-referenced matter. Please let me know if you have trouble opening or viewing the letter or any of the attachments. Thank you.

Sue Barragan  
Assistant to James Tupper  
**Tupper|Mack|Wells** PLLC  
2025 First Avenue | Suite 1100 | Seattle, WA 98121  
206.493-2307 (direct) | 206.493.2310 (fax)  
[barragan@tmw-law.com](mailto:barragan@tmw-law.com)



Website



Facebook



Twitter

## Nickel, Brian

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**From:** Steph Oliver [soliver@harsb.org]  
**Sent:** Wednesday, October 02, 2013 2:59 PM  
**To:** Nickel, Brian  
**Cc:** Ken Windram; GaryAllen@givenspursley.com; 'Paul Klatt (pklatt@jub.com)'  
**Subject:** EPA Comment Letter from HARSB (3)  
**Attachments:** Exhibit 2a- comment letter npdes permit 09272013.pdf

Stephanie Oliver  
Office/Accounting Manager



10789 N. Atlas Road  
Hayden, Idaho 83835

Phone: 208-772-0672  
Fax: 208-772-3863

## Nickel, Brian

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**From:** Steph Oliver [soliver@harsb.org]  
**Sent:** Wednesday, October 02, 2013 2:59 PM  
**To:** Nickel, Brian  
**Cc:** Ken Windram; 'Paul Klatt (pklatt@jub.com)'; GaryAllen@givenspursley.com  
**Subject:** EPA Comment Letter from HARSB- (2)  
**Attachments:** Exhibit 1a- comment letter npdes permit 09272013.pdf; Exhibit 2 (i)- comment letter npdes permit 09272013.pdf; Exhibit 2 (il)- comment letter npdes permit 09272013.pdf

Stephanie Oliver  
Office/Accounting Manager



10789 N. Atlas Road  
Hayden, Idaho 83835

Phone: 208-772-0672  
Fax: 208-772-3863

## Nickel, Brian

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**From:** Steph Oliver [soliver@harsb.org]  
**Sent:** Wednesday, October 02, 2013 2:58 PM  
**To:** Nickel, Brian  
**Cc:** Ken Windram; GaryAllen@givenspursley.com; 'Paul Klatt (pklatt@jub.com)'  
**Subject:** EPA Comment Letter from HARSB  
**Attachments:** epa harsb comment letter.pdf; Exhibit 1- comment letter npdes permit 09272013.pdf

Brian,

Here is the updated comment letter from Ken Windram, and associated exhibits which will be attached and follow in future emails  
Exhibit 1, 1a, 2 and 2a.

Stephanie Oliver  
Office/Accounting Manager



10789 N. Atlas Road  
Hayden, Idaho 83835

Phone: 208-772-0672  
Fax: 208-772-3863

## Nickel, Brian

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**From:** Rick Eichstaedt [ricke@cforjustice.org]  
**Sent:** Wednesday, October 02, 2013 12:54 PM  
**To:** june.bergguist@deg.idaho.gov; Nickel, Brian  
**Cc:** bart@cforjustice.org; jbel461@ecy.wa.gov; ABOR461@ECY.WA.GOV  
**Subject:** Comments on Spokane River NPDES Permits  
**Attachments:** Riverkeeper Comments on Draft Idaho NPDES Permits.pdf; PCHB Order.pdf; Letter to EPA re Participation in the SRRTTF.pdf

Please find attached comments and 2 attachments of the Spokane Riverkeeper of the draft NPDES permits for the Spokane River permittees in Idaho. Please include these in the administrative record of this matter and please ensure that we are included on the mailing list for any actions relative to these permits.

Rick Eichstaedt  
Attorney  
35 West Main, Suite 300  
Spokane, Washington 99201  
Phone: (509) 835-5211  
Fax: (509) 835-3867

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Think before you print.

## Nickel, Brian

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**From:** Steph Oliver [soliver@harsb.org]  
**Sent:** Wednesday, October 02, 2013 9:01 AM  
**To:** Nickel, Brian  
**Cc:** Ken Windram; GaryAllen@givenspursley.com; 'Paul Klatt (pklatt@jub.com)'  
**Subject:** Exhibits to Comments on HARSB Draft NPDES Permit

Brian,

Ken asked me to email you since he is out of town.  
He would like you to ignore the emails sent in last week due to a change that needed to be made.  
I will be forwarding emails out to you today as replacements.

Thank you,

Stephanie Oliver  
Office/Accounting Manager



10789 N. Atlas Road  
Hayden, Idaho 83835

Phone: 208-772-0672  
Fax: 208-772-3863

**Nickel, Brian**

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**From:** DEARTH, JOHN [JDEARTH@cdaid.org]  
**Sent:** Tuesday, October 01, 2013 8:53 AM  
**To:** Nickel, Brian  
**Subject:** NPDES Draft Permit Comments ID0022853  
**Attachments:** 2013 Draft Permit Comments.doc

Brian,

See Attached Comments for the 2013 City of Coeur d'Alene ID0022853 NPDES Draft Permit.

John Dearth  
Lab/Pretreatment Supervisor  
City of Coeur d'Alene  
710 E. Mullan  
Coeur d'Alene, Idaho 83814  
208-769-2276

## Nickel, Brian

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**From:** Susan Drumheller [sdrumheller@idahoconservation.org]  
**Sent:** Monday, September 30, 2013 12:47 PM  
**To:** june.bergquist@deq.idaho.gov; Nickel, Brian  
**Subject:** ICL Comments on NPDES Permits  
**Attachments:** 9302013NPDEScdacomment.pdf; 9302013NPDESHARSBcomments.pdf;  
9302013NPDESPFcomments.pdf

---

### Susan Drumheller

North Idaho Associate  
Idaho Conservation League  
P.O. Box 2308, Sandpoint, ID 83864  
208.265.9565 • fax 208.265.9560  
<http://www.idahoconservation.org> • <http://www.idahoconservation.org/blog>

Idaho's leading voice for conservation

**Celebrate 40 years of ICL! 1973-2013**

**Nickel, Brian**

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**From:** Ken Windram [ken@harsb.org]  
**Sent:** Friday, September 27, 2013 7:32 PM  
**To:** Nickel, Brian  
**Cc:** Gary G Allen; Paul Klatt; Steph Oliver  
**Subject:** Second Group of Exhibits to Comments on HARSB Draft NPDES Permit  
**Attachments:** Exhibits 1A.pdf

Hi Brian,

Here is the second group of exhibits for the HARSB Draft Permit Comments.

Thanks,

Ken Windram  
Administrator  
Hayden Area Regional Sewer Board  
208-772-0672  
[ken@harsb.org](mailto:ken@harsb.org)

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## Nickel, Brian

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**From:** Ken Windram [ken@harsb.org]  
**Sent:** Friday, September 27, 2013 7:36 PM  
**To:** Nickel, Brian  
**Cc:** Gary G Allen; Paul Klatt; Steph Oliver  
**Subject:** Exhibits to Comments on HARSB Draft NPDES Permit  
**Attachments:** Exhibits 2A.pdf

Hi Brian,

Here is the another group of exhibits for the HARSB Draft Permit Comments.

I believe there is one more group of exhibits which I will send on Monday.

Thanks,

Ken Windram  
Administrator  
Hayden Area Regional Sewer Board  
208-772-0672  
[ken@harsb.org](mailto:ken@harsb.org)

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**Nickel, Brian**

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**From:** Ken Windram [ken@harsb.org]  
**Sent:** Friday, September 27, 2013 7:19 PM  
**To:** Nickel, Brian  
**Cc:** Gary G Allen; Paul Klatt; Steph Oliver  
**Subject:** Exhibits to Comments on the HARSB Draft NPDES Permit  
**Attachments:** Exhibit 1.pdf

Hi Brian,

Attached are the first group of exhibits.

Exhibit 1  
Exhibit 1A  
Exhibit 2  
Exhibit 2A

Thanks,

Ken Windram  
Administrator  
Hayden Area Regional Sewer Board  
208-772-0672  
[ken@harsb.org](mailto:ken@harsb.org)

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**Nickel, Brian**

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**From:** Ken Windram [ken@harsb.org]  
**Sent:** Friday, September 27, 2013 7:17 PM  
**To:** Nickel, Brian  
**Cc:** Gary G Allen; Paul Klatt; Steph Oliver  
**Subject:** Comments on Draft NPDES Permit - Hayden Area Regional Sewer Board, Idaho NPDEX No. ID-0026590  
**Attachments:** HARSB DRAFT PERMIT COMMENT LETTER TO EPA.pdf

Hello Brian,

Attached is the Hayden Area Regional Sewer Board Draft Permit Comment letter.

The following emails will have the attachments which are referred to in the comment letter.

Please send me an email confirming you received the Draft Permit comment letter and the attachments.

Thanks,

Ken Windram  
Administrator  
Hayden Area Regional Sewer Board  
208-772-0672  
[ken@harsb.org](mailto:ken@harsb.org)

Privileged / confidential information may be contained in this message. If you are not the addressee indicated in this message ( or responsible for delivery of the message to such person), you may not copy or send this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply e-mail. Although this email has been scanned for the possible presence of computer viruses prior to dispatch, we cannot be held responsible for any viruses or other material transmitted with, or as part of, this email without our knowledge.

## Nickel, Brian

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**From:** Donna Cooper [donnacooper@givenspursley.com]  
**Sent:** Friday, September 27, 2013 1:41 PM  
**To:** Nickel, Brian  
**Cc:** 'daniel.redline@deq.idaho.gov'; 'Ken Windram'; 'Michael Neher'; 'Paul Klatt'; 'Terry Werner'; Gary G Allen  
**Subject:** Exhibits - Volume 2 - Comments on Draft NPDES Permit (City of Post Falls) No. ID-002585-2 [IWOV-GPDMS.FID460667]  
**Attachments:** Exhibits 2.pdf

Volume 2. Confirmation of receipt appreciated ☺

Donna Cooper  
Givens Pursley LLP  
Assistant to Ed Miller and Gary Allen  
P. 208.388.1251 F. 208.388.1300  
610 W. Bannock  
Boise, ID 83702

## Nickel, Brian

---

**From:** Donna Cooper [donnacooper@givenspursley.com]  
**Sent:** Friday, September 27, 2013 1:37 PM  
**To:** Nickel, Brian  
**Cc:** 'daniel.redline@deq.idaho.gov'; 'Ken Windram'; 'Michael Neher'; 'Paul Klatt'; 'Terry Werner'  
**Subject:** Exhibits - Volume 1 - to Comments on Draft NPDES Permit No. ID-002585-2 (City of Post Falls)  
**Attachments:** Exhibit 1.pdf

As promised, Volume 1. Please confirm receipt.  
Thanks much!

Donna Cooper  
Givens Pursley LLP  
Assistant to Ed Miller and Gary Allen  
P. 208.388.1251 F. 208.388.1300  
610 W. Bannock  
Boise, ID 83702

## Nickel, Brian

---

**From:** Donna Cooper [donnacooper@givenspursley.com]  
**Sent:** Friday, September 27, 2013 1:36 PM  
**To:** Nickel, Brian  
**Cc:** 'daniel.redline@deq.idaho.gov'; 'Ken Windram'; 'Michael Neher'; 'Paul Klatt'; 'Terry Werner'; Gary G Allen  
**Subject:** Comments on Draft NPDES Permit - City of Post Falls, Idaho NPDEX No. ID-002585-2 [IWOV-GPDMS.FID460667]  
**Attachments:** 2976\_001.pdf

Dear Sir: For the record regarding the above-named permit, attached please find Comments on Draft Permit letter. Exhibits will be sent in 2 separate emails as they are very voluminous. Please confirm receipt.

Thank you very much.

Donna Cooper

Givens Pursley LLP

Assistant to Ed Miller and Gary Allen

P. 208.388.1251 F: 208.388.1300

610 W. Bannock

Boise, ID 83702

## Nickel, Brian

---

**From:** Billy Joe Kieffer [bjk@SpokaneTribe.com]  
**Sent:** Tuesday, September 17, 2013 12:02 PM  
**To:** Nickel, Brian  
**Cc:** McLerran, Dennis; Rudy Peone; crossley@spokanetribe.com; Ted Knight  
**Subject:** Spokane Tribe Comments  
**Attachments:** STOI Comments NPDES permits.pdf; Attachment A.pdf; Attachment B.pdf; Attachment C.pdf; Attachment D.pdf; Attachment E.pdf

**Importance:** High

Brian,

I am submitting comments to you on the NPDES Permits, the original letter with attachments are being delivered tomorrow via FedEx. I am also sending 5 attachments with the comment letter. Additional documents will be arriving to you via mail shortly.

Thanks

B.J. Kieffer- Director  
Department of Natural Resources  
Spokane Tribe of Indians  
PO BOX 480  
Wellpinit, Wa 99040

(509) 626-4427

## Nickel, Brian

---

**From:** bb@nwpoa.org  
**Sent:** Friday, September 13, 2013 12:53 PM  
**To:** Nickel, Brian  
**Subject:** RE: EPA proposed discharge limits and treatment for Post Falls, Cda and Hayden.

Brian,

You can refer to me as Bob, rather than Mr Bingham ..... you're sounding like my wife when I'm in trouble! LOL

In briefly examining the Spokane waste website & data <http://www.spokanewastewater.org/csupdate.aspx#Monthly> it appears they have a significant number of direct sewage flow events into the river. It seems to me that we'd all agree that those should be the first plan of attack? Look at the June report .... Nobody has to wonder why Spokane Lake reports some high po4 and N2 numbers.

Changing gears, what is needed, (just from a credibility standpoint) is a very clear map with discharge points, river and discharge flows, contaminate levels (ppm) in a month by month form. Because of the typically dogmatic environmentalist input, I'd like to see the entire Columbia river system the tributaries mapped with good data, then from that we can make good decisions. I do not see how the shear runoff volume coming from North Idaho, with the relatively small discharge points from these 3 cities, can in anyway compete with the massive input from Spokane. Somebody once said, the first animal you should subdue is the big gorilla, the smaller monkeys will yield after seeing the big gorilla beat up.

A lot of folks like me use to live in Washington State, we left there because they are nuts with regards to regulations, and then we find out they are dictating our policies here in Idaho ... nuts!

Thanks!

Bob Bingham  
[bb@nwpoa.org](mailto:bb@nwpoa.org)  
Founder/Director  
[www.nwpoa.org](http://www.nwpoa.org)  
208-956-0638 message center

---

**From:** Nickel, Brian [mailto:Nickel.Brian@epa.gov]  
**Sent:** Friday, September 13, 2013 9:43 AM  
**To:** bb@nwpoa.org  
**Subject:** RE: EPA proposed discharge limits and treatment for Post Falls, Cda and Hayden.

Dear Mr. Bingham:

We will formally respond to these and all other comments we receive on the draft permits for the City of Post Falls, City of Coeur d'Alene, and the Hayden Area Regional Sewer Board when we issue the final permits.

However, it is apparent from your message that I didn't do a good job of explaining the requirements placed on Washington municipalities discharging to the Spokane River. I will try to remedy that in this message.

In 2011, the State of Washington Department of Ecology issued National Pollutant Discharge Elimination System permits to the City of Spokane, Spokane County and the Liberty Lake Sewer and Water District. **All** of those permits include stringent effluent limits for phosphorus, biochemical oxygen demand, and ammonia, which are similar to those in the Post Falls, Coeur d'Alene and Hayden permits.

I think the source of the confusion is that, with the exception of Spokane County, all of those permits also include compliance schedules, which allow the utilities time to make upgrades to their treatment systems to meet the new

limits. So, when I answered your question at the workshop, I said that only one facility (Spokane County) is “currently” being required to meet limits as stringent as those in the Post Falls, Coeur d’Alene, and Hayden permits. However, the City of Spokane and the Liberty Lake Water and sewer district will be required to meet those limits in the near future. Specifically, the Spokane and Liberty Lake permits require compliance with the new limits no later than March 1, 2021. See the Liberty Lake permit at Pages 7-8, and the Spokane permit at Pages 8-10 (both are attached). You can also find information about any of Washington’s wastewater permits here:

<http://www.ecy.wa.gov/programs/wq/permits/paris/paris.html>

As you point out in your message, the draft permits for Post Falls, Coeur d’Alene and Hayden include compliance schedules, which allow the Idaho utilities 10 years after the permits become effective to achieve compliance with the new limits for phosphorus and biochemical oxygen demand. By that time, the compliance schedules in the City of Spokane and the Liberty Lake Sewer and Water District permits will have ended, and those Washington utilities will be required to meet the new limits.

I hope this is clearer than my explanation at the workshop.

Since compliance schedules are authorized by the Idaho Department of Environmental Quality, I will forward your comments to them for their consideration as well.

Thank you,

Brian Nickel, E.I.T.

Environmental Engineer

US EPA Region 10 | Office of Water and Watersheds | NPDES Permits Unit

Voice: 206-553-6251 | Toll Free: 800-424-4372 ext. 6251 | Fax: 206-553-0165

Nickel.Brian@epa.gov

<http://epa.gov/r10earth/waterpermits.htm>

*Please conserve natural resources by not printing this message.*

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**From:** bb@nwpoa.org [mailto:bb@nwpoa.org]

**Sent:** Friday, September 13, 2013 8:27 AM

**To:** Nickel, Brian

**Subject:** FW: EPA proposed discharge limits and treatment for Post Falls, Cda and Hayden.

Brain,

Since attending your local Cda Library mtg, *(and thank-you for answering some of my questions!)* I'd like to **strongly suggest** that the EPA delay the implementation of the proposed limits on Post Falls, Cda, and Hayden. After learning that the burden of such strict compliance would be put upon these three Idaho cities, while perhaps no other Washington based municipality is being required to meet these strict limits is .... well “absurd”. You may recall I asked the question, *“Assume between here and the river path to the Pacific ocean, that there are 100 municipal wastewater discharge points, what percent are currently being required to comply with standards as strict as being forced upon Post Falls, Cda, and HARSB?”* you replied, “zero” ... then elaborated further saying *“perhaps one”*.

I find that Idaho is being forced to comply with regulations that Washington State is requiring, while not themselves doing it, to be ridiculous. Washington State needs to step up before they force Idaho to. Any regulations doing otherwise in a word, “wacked”.

**I'm suggesting that the EPA amend the permit to**

1. That the EPA extend the compliance date (of 10yrs) to meet the requirements to a point when at least 50% (or better yet, 70%) of all the Washington State municipal NPDES point discharge entities also meet these same stringent standards along the river system to the west coast.

**and/or**

2. That the requirement deadline be stretched from 10 yrs to 15-18 yrs to allow each of the 3 North Idaho Cities to gradually begin to raise sewer rates and to gradually accumulate the required funds instead of having to force citizens to experience doubling and perhaps tripling of their sewer rates.

I hope the EPA will seriously consider this input, the EPA's reputation has been going down hill rapidly over the last few years and it is long past time to start making good decisions. Picking on little people and little cities will win you no friends.

The typical minority of dogmatic and radical environmentalist groups may be the main people showing up to push all this, but ultimately the vast majority is the common folk and the EPA needs to start considering them.

Thanks!  
Bob Bingham

**From:** [bb@nwpoa.org](mailto:bb@nwpoa.org) [mailto:[bb@nwpoa.org](mailto:bb@nwpoa.org)]  
**Sent:** Tuesday, August 27, 2013 12:21 PM  
**To:** Nickel, Brian  
**Cc:** [Clarkin@postfallsidaho.org](mailto:Clarkin@postfallsidaho.org); [dgookin@cdaid.org](mailto:dgookin@cdaid.org); [vrutherford@cityofhaydenid.us](mailto:vrutherford@cityofhaydenid.us)  
**Subject:** EPA proposed discharge limits and treatment for Post Falls, Cda and Hayden.

Brain,

I'm going to try to be at the public meetings tomorrow and would like the following questions submitted and answered as a matter of public record regarding the proposed change to the 3 city discharge permits here in North Idaho. I have the opinion from a casual review of NPDES permits in north Idaho and Washington's state (*administered by Washington state*) that these 3 permits are the strictest, (*I found none with standards as strict*) which causes me concern.

1. How many municipal wastewater NPDES permits are there in the EPA database that the EPA oversees?
2. How many municipal wastewater NPDES permits are there in State run programs database that the EPA requires, but allows the respective state to assume oversight and jurisdiction?
3. From a combination of the two questions above, what % are as strict as the proposals being put forth upon Post Falls, Cda, and Hayden?
4. How many municipal wastewater NPDES permits in Region 10 along the waterway system that these 3 cities discharge into?
5. Please provide a map showing the locations of each and their respective permit limits (*Nitrogen and phosphorus/phosphate*) and respective permit renewal dates. (*I ask this because I've seen permits recently renewed but not near as strict*)
6. Please provide the last 10 yrs of annual historical records for nitrogen and phosphorus/phosphate sampling along the path 50 miles upstream and 250 miles down stream of these 3 discharge source points.
7. Please list all municipal permits that have equal to or stricter limits and their permit limits along the entire river path to the Pacific ocean. I have at least one USGS map showing much higher concentrations along the Pacific Coast rather than inland.
8. Please comment on the BPA government program that is **adding** both phosphate and nitrogen to improve fisheries in a NW river.
9. Please provide comment on the effect banning phosphate in detergents has had on any these specific water ways.
10. Please provide a summary of the methods used for collection, handling and analyzing of samples including standardization of equipment.
11. Please discuss the known effects of farming, ranching along the path 50 miles upstream and 250 miles down stream of these 3 cities.

12. Please describe the current percent permit removal or achievement and the proposed change.
13. Please quantify the number of total other municipal permits being required to attain these same reduction goals and why not all permits are being forced to the same standards.
14. If these permits are instituted, please provide the projected net gains (what ever they may be) to river quality and the methods used to predict/forecast such gains.

Certainly we all care about our water quality and those of us with experience in waste discharge understand we are basically recycling our waste streams.

An electronic reply with links to specific data and answers to questions is greatly appreciated. Please also acknowledge receipt of this inquiry.

Thank-you

Bob Bingham  
[bb@nwpoa.org](mailto:bb@nwpoa.org)  
Founder/Director  
[www.nwpoa.org](http://www.nwpoa.org)  
208-956-0638 message center

## Nickel, Brian

---

**From:** bb@nwpoa.org  
**Sent:** Friday, September 13, 2013 11:56 AM  
**To:** Nickel, Brian  
**Subject:** RE: EPA proposed discharge limits and treatment for Post Falls, Cda and Hayden.

Thanks!

Bob Bingham  
[bb@nwpoa.org](mailto:bb@nwpoa.org)  
Founder/Director  
[www.nwpoa.org](http://www.nwpoa.org)  
208-956-0638 message center

---

**From:** Nickel, Brian [mailto:Nickel.Brian@epa.gov]  
**Sent:** Friday, September 13, 2013 9:47 AM  
**To:** Daniel.Redline@deq.idaho.gov; June Bergquist  
**Cc:** bb@nwpoa.org  
**Subject:** FW: EPA proposed discharge limits and treatment for Post Falls, Cda and Hayden.

Dan, June:

I received these comments on the City of Post Falls, City of Coeur d'Alene, and Hayden Area Regional Sewer Board permits today. I'm forwarding them to you because they concern the compliance schedules, which are proposed in IDEQ's draft Clean Water Act Section 401 certifications. I have copied the commenter to inform him that I've forwarded these comments.

Thank you,

Brian Nickel, E.I.T.

Environmental Engineer  
US EPA Region 10 | Office of Water and Watersheds | NPDES Permits Unit  
Voice: 206-553-6251 | Toll Free: 800-424-4372 ext. 6251 | Fax: 206-553-0165  
[Nickel.Brian@epa.gov](mailto:Nickel.Brian@epa.gov)  
<http://epa.gov/r10earth/waterpermits.htm>  
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**From:** bb@nwpoa.org [mailto:bb@nwpoa.org]  
**Sent:** Friday, September 13, 2013 8:27 AM  
**To:** Nickel, Brian  
**Subject:** FW: EPA proposed discharge limits and treatment for Post Falls, Cda and Hayden.

Brain,

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I find that Idaho is being forced to comply with regulations that Washington State is requiring, while not themselves doing it, to be ridiculous. Washington State needs to step up before they force Idaho to. Any regulations doing otherwise in a word, "wacked".

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1. That the EPA extend the compliance date (of 10yrs) to meet the requirements to a point when at least 50% (or better yet, 70%) of all the Washington State municipal NPDES point discharge entities also meet these same stringent standards along the river system to the west coast.  
**and/or**
2. That the requirement deadline be stretched from 10 yrs to 15-18 yrs to allow each of the 3 North Idaho Cities to gradually begin to raise sewer rates and to gradually accumulate the required funds instead of having to force citizens to experience doubling and perhaps tripling of their sewer rates.

I hope the EPA will seriously consider this input, the EPA's reputation has been going down hill rapidly over the last few years and it is long past time to start making good decisions. Picking on little people and little cities will win you no friends. The typical minority of dogmatic and radical environmentalist groups may be the main people showing up to push all this, but ultimately the vast majority is the common folk and the EPA needs to start considering them.

Thanks!  
Bob Bingham

**From:** [bb@nwpoa.org](mailto:bb@nwpoa.org) [<mailto:bb@nwpoa.org>]  
**Sent:** Tuesday, August 27, 2013 12:21 PM  
**To:** Nickel, Brian  
**Cc:** [Clarkin@postfallsidaho.org](mailto:Clarkin@postfallsidaho.org); [dgookin@cdaid.org](mailto:dgookin@cdaid.org); [vrutherford@cityofhaydenid.us](mailto:vrutherford@cityofhaydenid.us)  
**Subject:** EPA proposed discharge limits and treatment for Post Falls, Cda and Hayden.

Brain,

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Nickel, Brian

---

**From:** bb@nwpoa.org  
**Sent:** Friday, September 13, 2013 8:27 AM  
**To:** Nickel, Brian  
**Subject:** FW: EPA proposed discharge limits and treatment for Post Falls, Cda and Hayden.

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**Sent:** Tuesday, August 27, 2013 12:21 PM  
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208-956-0638 message center

## Nickel, Brian

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**From:** Daniel.Redline@deq.idaho.gov  
**Sent:** Wednesday, September 04, 2013 8:52 AM  
**To:** Nickel, Brian  
**Subject:** FW: 2013-09-03 401 Comment Ltr.pdf - Adobe Acrobat Professional  
**Attachments:** 2013-09-03 401 Comment Ltr.pdf

Brian,

Here are the comments that we received from the City of CDA yesterday regarding their draft 401 certification.

Dan Redline  
Regional Administrator, Coeur d'Alene Office  
Idaho Department of Environmental Quality  
Office Phone: 208-769-1422  
Direct Line: 208-666-4621  
Daniel.redline@deq.idaho.gov

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**From:** James Tupper [mailto:tupper@tmw-law.com]  
**Sent:** Tuesday, September 03, 2013 2:42 PM  
**To:** Daniel Redline; June Bergquist  
**Cc:** FREDRICKSON, SID  
**Subject:** 2013-09-03 401 Comment Ltr.pdf - Adobe Acrobat Professional

Dear Mr. Redline and Ms. Bergquist,

Attached is a comment letter on behalf of the City of Coeur D'Alene on the Revised Draft 401 Water Quality Certification for its Wastewater Treatment Plant NPDES permit.

Please let me know if you have any problems opening the attachment.

James A. Tupper, Jr.

**Tupper|Mack|Wells PLLC**  
2025 First Avenue | Suite 1100 | Seattle, WA 98121  
206.493.2317 (direct) | 206.493.2310 (fax) | 206.818.1871 (cell)  
[tupper@tmw-law.com](mailto:tupper@tmw-law.com)



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**Nickel, Brian**

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**From:** Schoedel, Elizabeth [eschoedel@spokanecity.org]  
**Sent:** Thursday, August 29, 2013 4:51 PM  
**To:** Nickel, Brian  
**Subject:** Idaho NPDES permits Comments from City of Spokane  
**Attachments:** ID NPDES permit - comment letter to EPA 8-28-13.pdf

Dear Mr. Nickel

Attached please find the City of Spokane's comments to the Draft Idaho NPDES permits. I came to my attention after the original letter was mailed to Mr. Opalski, that your name had inadvertently been omitted from the cc list. Please accept my apologies.

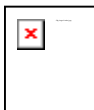
Please let me know if you have any questions or difficulties with the attachment.

Thank you

ELS

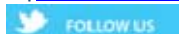
*Confidential & Privileged Legal Materials*

***[No Disclosure Authorized Without Express Consent of Client(s) & City Attorney]***



**Elizabeth Schoedel** | City of Spokane | Assistant City Attorney

509.625.6225 | fax 509.625.6277 | [ESchoedel@spokanecity.org](mailto:ESchoedel@spokanecity.org) | [www.spokanecity.org](http://www.spokanecity.org)



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## Nickel, Brian

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**From:** Lisa Fitzner [lefitzner@aol.com]  
**Sent:** Thursday, July 18, 2013 3:47 PM  
**To:** Nickel, Brian  
**Subject:** NPDES Permits

Great job getting Coeur d'Alene etc... to clean up the Spokane River. Just wish it could happen sooner

Lisa Fitzner  
CDA

Sent from my iPhone